

---

**United States District Court**  
**WESTERN DISTRICT OF MISSOURI**  
**WESTERN DIVISION**

UNITED STATES OF AMERICA

v.

VONTERRIOUS HUMBERT  
[DOB: 01/12/2000],

TREMAINE JOHNSON  
[DOB: 11/28/1998],

and

HENRY SIMMONS  
[DOB: 03/06/2000].



**COUNT ONE:**

***Conspiracy to Commit Hobbs Act Robberies***

18 U.S.C. § 1951(a)

NMT: 20 Years' Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

**COUNT TWO:**

***Use of a Firearm During and in Relation to a Crime of Violence***

18 U.S.C. § 924(c)(1)(A) and (ii)

18 U.S.C § 2

NMT: Life Imprisonment

NLT: 7 years' Imprisonment

*Consecutive to any other sentence*

NMT: \$250,000 Fine

NMT: 5 Years Supervised Release

Class A Felony

\$100 Mandatory Special Assessment Each Count

**CRIMINAL COMPLAINT**

**Case Number: 18-MJ-00173-JTM**

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**COUNT ONE**

Between on or about November 21, 2018, and November 27, 2018, in the Western District of Missouri, the defendants, **VONTERRIOUS HUMBERT**, **TREMAINE JOHNSON**, and **HENRY SIMMONS**, did knowingly and intentionally conspire with each other and others to unlawfully obstruct, delay, and affect, and attempt to obstruct, delay and affect commerce as that term is defined in 18 U.S.C. § 1951, and the movement of any article or commodity in commerce in some way and degree by robbery, as that term is defined in 18 U.S.C.

§ 1951, in that the defendants did knowingly, intentionally, and unlawfully take and obtain property, consisting of United States Currency from employees of businesses engaged in interstate commerce, and such property was taken against the employees' will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person, that is, the defendants brandished a firearm during demands for property from the employees. All in violation of Title 18, United States Code, Section 1951(a).

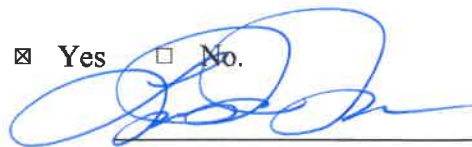
### COUNT TWO

Between on or about November 21, 2018, and November 27, 2018, in the Western District of Missouri, the defendants, **VONTERRIOUS HUMBERT**, **TREMAINE JOHNSON**, and **HENRY SIMMONS**, aiding and abetting each other, did knowingly and intentionally carry, use, and brandish a firearm during and in relation to a crime of violence for which they may be prosecuted, that is conspiracy to commit robbery affecting interstate commerce as charged in Count One, all allegations of which are incorporated by reference herein, contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

I further state that I am a detective with the Independence, Missouri Police Department and that this complaint is based on the following facts:

(See attached Affidavit)

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No.



LORAN FREEMAN

Detective

Independence, Missouri Police Department

Sworn to before me and subscribed in my presence,

11/27/18  
Date

at

Kansas City, Missouri  
City and State

Honorable Lajuana M. Counts  
U.S. Magistrate Judge  
Name and Title of Judicial Officer

  
Signature of Judicial Officer